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September 23, 2021

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions so that Mr. Goettsche will be allowed to accompany Danielle Goettsche, his wife and one of his third-party custodians, to bring their children directly to school on weekday mornings and return directly back to the residence after school drop off. Ms. Goettsche would coordinate with Pretrial Services. The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved a modification to these conditions to allow Mr. Goettsche to travel to and from his attorneys' office in Denver to review discovery in coordination with Pretrial Services (dkt 187).

Pretrial Services has no objection to our proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

SO ORDERED

9/29/2021

s/Michael A. Hammer

Hon. Michael A. Hammer, USMJ

Hon. Michael A. Hammer

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